

Message

From: Poulsom, Susan [Poulsom.Susan@epa.gov]
Sent: 11/28/2018 7:03:23 PM
To: Poulsom, Susan [Poulsom.Susan@epa.gov]
Subject: FW: Tomorrow's call

From: Wu, Jennifer
Sent: Wednesday, November 28, 2018 10:00 AM
To: Poulsom, Susan <Poulsom.Susan@epa.gov>; Merz, Martin <merz.martin@epa.gov>
Subject: FW: Tomorrow's call

For today's call with Ellie

From: Wu, Jennifer
Sent: Tuesday, November 27, 2018 3:17 PM
To: Ott, Ellie (ECY) <EKEY461@ECY.WA.GOV>
Subject: RE: Tomorrow's call

Just Martin Merz who will be sitting in. He's helping on the permits.

From: Ott, Ellie (ECY) <EKEY461@ECY.WA.GOV>
Sent: Tuesday, November 27, 2018 3:15 PM
To: Wu, Jennifer <Wu.Jennifer@epa.gov>
Subject: RE: Tomorrow's call

Thanks for the heads up on all of these, Jenny.

We should be able to talk through all of these. I saw Susan's name on the invite. Will anyone else be joining us?

M. Eleanor Ott, P.E.

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From: Wu, Jennifer [mailto:Wu.Jennifer@epa.gov]
Sent: Tuesday, November 27, 2018 2:21 PM
To: Ott, Ellie (ECY) <EKEY461@ECY.WA.GOV>
Subject: Tomorrow's call

Hi Ellie, we're looking forward to talking tomorrow. Here's the list of some of the comments you provided that we'd like to discuss, have questions on, or wanted to run by our approach with you. If you'd like to know how we're considering your other comments, we can discuss, too. Here's a link to Adobe Connect in case we want to share screens:

<https://epawebconferencing.acms.com/jennywu>

1. Tables 1/2/3: How is flow to be measured once per month at these outfalls assuming these are continuous discharges? Ecology recommends continuous flow recording to assist in limit development in the next permit and to verify discharge volumes listed in the fact sheet for all cooling water and other continuous discharges. If outfalls associated with drainage sumps do not have continuous discharges and are based on the frequency of emptying a sump via pumping, then clarify that the flow rate should be recorded during every discharge event.
 - *Would like to hear your thoughts on purpose of flow collection and frequency monitoring*

Include flow diagram for each outfall in the Fact Sheet.

2. Tables 1/2/3: Frequency of pH and oil & grease reporting should be more frequent for the continuous discharge. At least through the first few years of the permit. If monitoring shows consistent results, the permittee may request a reduction in monitoring. Also, how does EPA expect to assess compliance of the O&G daily maximum with only one grab sample per month?
 - *We're thinking 1/week for the first year and if NDs for outfalls, it can shift to monthly monitoring. Thoughts?*

Ellie: Verify that pH is in the range. Have a solid year of data. We don't understand variability.

3. QAP: The requirements for the Quality Assurance Plan do not indicate that the QAP is subject to EPA review and approval. As a permit submittal that forms the basis of the self-reporting requirements, Ecology believes that the document (and any subsequent revisions) should be subject to agency approval.
 - *We can discuss further.*

Ellie: Will ask QA people. WQ QA people. We need to table. QA: focus on temperature primarily and to a less degree PCBs

4. BMP Plan: This section does not include a specific provision for EPA review and approval. As a permit submittal the initial report and any annual updates should be reviewed (and approved) to ensure completeness and accuracy. Please revise B.3.c to include specific language about submission requirements and subsequent approval by the Director or an authorized representative.
 - *We can discuss further.*

Disregard.

5. BMP Plan: Use of a BMP infers that there is reasonable potential to violate a water quality standard. Plan requirements involve amendments when there are changes in design, etc. at the facility. How will the facility know that the implemented BMPs are correctly functioning as installed without effectiveness monitoring? This is especially the case regarding release of any PCB containing fluids. Also, as written the plan does not include a quantifiable source reduction requirement. Appendix B requires a summary of existing discharge data; however, the sampling requirements listed in Section I of the draft permit do not substantiate the adaptive management process that makes a BMP process successful. Note: effectiveness monitoring does not need to use 40 CFR 136 methods. For some parameters, these methods are not sensitive enough to form the basis of an adaptive management/BMP approach.
 - *We will plan on including some kind of PCB monitoring.*

We agree to have some sort of verification. Ellie: assumes we are using low level. There will be a blank exercise. Summing congeners. 1668(c) if 10x blank, you zero out. Variable based on contamination. Added chapter 6 to permit writers manual regarding PCBs. Ellie wants a minimum of 1/year

Send to Lisa

6. IV.G.2: Anticipated Bypass – Ecology asks EPA to consider including conditions related to the written notice required when the permittee notifies EPA of an anticipated bypass. These include a description of the bypass

and reason it's necessary, analysis of alternatives that would eliminate, reduce, or remove potential impacts, the expected duration, projected date, compliance with NEPA/SEPA, plans to reduce reoccurrence of bypass.

- *Did not have a chance to discuss internally; will discuss further.*

Ellie explained that there is their template language. Totally up to us.

7. Ecology understands that the Idaho Hydroelectric Facility GP's Biological Evaluation studied potential temperature impacts from cooling water from two facilities. However, this evaluation included evaluating the temperature increase using a percentage of receiving water flow for mixing. Ecology supports the requirement for continuous temperature monitoring to inform the TMDL and the next permit cycle; however, any evaluation of temperature impacts in the Lower Columbia cannot incorporate mixing as state water quality standards preclude a mixing zone for impaired waterbodies. Please also provide discussion regarding how these permits will incorporate temperature TMDL WLAs if approved. See individual permit comments for additional discussion regarding receiving water temperature monitoring.
 - *Would like to share with you proposed temp limit approach consistent with expected WLAs in upcoming Columbia TMDL*

We discussed the timing part of the impairment and the temperature WLA. Will have limits only seasonally and continuous monitoring year round.

8. TSS was identified as a pollutant of concern in the fact sheet; however, none of the permits contain monitoring for this parameter. Rather, they only include a visual observation. Monitoring for TSS should be included in the Bonneville Project and Dalles Lock and dam permits, if only to provide a metric for the BMP Plan adaptive management strategy. See individual permit comments.
 - *Did not have a chance to discuss internally; will discuss further.*

We have going back and forth with TSS monitoring.

We need to follow up explaining that numeric limits not possible therefore BMPs

9. Section VIII, D; please provide information related to the original NEPA determination and the date that it was approved for each of the dams.
 - *Did not have a chance to discuss internally; will discuss further.*

Explaining why NEPA doesn't apply.

Other questions from Ellie:

Process – Wait until Dec. 13th with letter requesting more time. Don't want to certify conditions. Need to get through Grand Coulee. 316(b) hanging out there. Talked with Todd from Colville. Asking if Tier 2 applied? No because of impairment.

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